

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION – DETROIT

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In re: : Chapter 9
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CITY OF DETROIT, MICHIGAN, : Case No.: 13-53846
: :
Debtor. : Hon. Steven W. Rhodes
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**RESPONSE AND STATEMENT OF INTERNATIONAL UNION, UAW
REGARDING THE COURT’S MAY 28, 2014 MINUTE ENTRY RE
PROPOSED TRIAL TIME ALLOTMENTS**

The International Union, UAW (“UAW”) files this response and statement concerning the Court’s May 28, 2014 minute entry that required the Discovery and Trial Efficiency Committee (“DTEC”) to file a paper by June 6, 2014 on certain issues, including proposed time allotments for each side’s trial presentation. In its June 6, 2014 “Statement of Objectors Addressing Certain Discovery and Trial Issues” [Docket No. 5246], the DTEC provided certain estimates for allocation of trial time for the confirmation trial, although it stated that it believes that establishing trial time allocations at this early point in the discovery process is premature. *See id.* at 11-12.

The UAW, which is not a member of the DTEC, submits this separate filing because it remains contingent and uncertain whether the UAW will file an

objection or conditional objection and on what bases it may object. In a stipulation approved by the Court on May 12, 2014 [Docket No. 4617], the UAW and City of Detroit (the “City”) agreed, among other things, that certain deadlines in the Fourth Amended Scheduling Order should be modified as to the UAW. The UAW’s time to file an objection to confirmation was extended to June 22, 2014 and its time to file a conditional objection to July 17, 2014, dependent on the occurrence or non-occurrence of certain specified events.

Because it remains uncertain whether the UAW will object to confirmation and on what bases, and because its time to do so has been extended, the UAW respectfully requests that the Court permit the UAW to reserve its rights regarding the trial time it will be allotted, and to permit the UAW to request an appropriate time allotment following its filing of a plan objection or conditional objection.

Dated: June 9, 2014

Respectfully submitted,

By: /s/ *Peter D. DeChiara*

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CERTIFICATE OF SERVICE

I certify that on this 9th day of June 2014, I caused the foregoing document to be served on counsel for all parties of record through the Court's CM/ECF system.

/s/ *Peter D. DeChiara*
Peter D. DeChiara